

# **EXHIBIT C**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
AT DAYTON

JOHN DOE NO. 1, JANE DOE NO. 1, )  
JOHN AND JANE DOE NO. 1, )  
JOHN DOE NO. 2, JANE DOE NO. 2, )  
JOHN DOE NO. 3, JOHN DOE NO. 3, )  
JANE DOE NO. 4, JANE DOE NO. 4, )  
JANE DOE NO. 5, JANE DOE NO. 5, )  
JANE DOE NO. 6, JANE DOE NO. 7, )  
JANE DOE NO. 7, JOHN DOE NO. 8, )  
JANE DOE NO. 8, JOHN DOE NO. 9, )  
Plaintiff, ) CASE NO. 3:22-CV-00337  
-vs- )  
BETHEL LOCAL SCHOOL DISTRICT BOARD )  
OF EDUCATION, LYDDA MANSFIELD, LORI )  
SEBASTIAN, NATALIE DONAHUE, DANNY )  
ELAM, JACOB KING, MATTHEW CHRISPIN, ) STATUS CONFERENCE  
Defendant, )  
-vs- )  
ANNE ROE, ) Via AT&T  
Intervenor Defendant. )

TRANSCRIPT OF PROCEEDINGS  
BEFORE THE HONORABLE **MICHAEL J. NEWMAN**,  
UNITED STATES DISTRICT JUDGE, PRESIDING  
TUESDAY, DECEMBER 13, 2022  
DAYTON, OH

**APPEARANCES:**

**For the Plaintiffs, John Does and Jane Does:**

**JOSEPH PATRICK ASHBROOK, ESQ.**  
Ashbrook Byrne Kresge LLC  
P.O. Box 8248  
Cincinnati, Ohio 45249

AND

**JULIE ELIZABETH BYRNE, ESQ.**  
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1     **For the Defendants Bethel Local School District Board of**  
2     **Education, Lydda Mansfield, Lori Sebastian, Natalie Donahue,**  
3     **Danny Elam, Jacob King, and Matthew Chrispin:**

4                     **LYNNETTE DINKLER, ESQ.**  
5                     Dinkler Law Office, LLC  
6                     174 Lookout Drive  
7                     Dayton, Ohio 45419

8                     AND

9                     **JOHN ANTHONY PODGURSKI, ESQ.**  
10                    Law Office of John Podgurski  
11                    9155 Chillicothe Road  
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13  
14     **Courtroom Deputy:               Ms. Claire McDowell**

15                    Proceedings reported by mechanical stenography,  
16     transcript produced by computer.

17                    **Julie Hohenstein, RPR, CRR, RMR**  
18                    Federal Official Court Reporter  
19                    200 West Second Street  
20                    Dayton, OH 45402  
21                    \*\*\* \*\*

1 week, but I think without any question if we were to meet  
2 with the Court again next week, that we would be able to  
3 have that completed.

4 I, I do want to also mention with regard to timing  
5 and hearing from all parties that may have an interest in  
6 this matter, I have reason to believe that the ACLU may be  
7 filing an intervening pleading; and it may be appropriate to  
8 have them at the table sooner than later if that is -- if  
9 that, in fact, becomes a reality.

10 From a timing point of view, and me being able to  
11 fairly investigate the claims -- and, Joey, I appreciate  
12 that, you know, you served John with the PI; and you know  
13 that I was just recently brought on board through the  
14 school's pool.

15 The school is on holiday break from December 16  
16 to January 3. I have to make contact with -- and I've  
17 been working on this steadfastly and still have not been  
18 able to have a sit-down meeting but hope to be doing that  
19 yet this week -- with a former employee, the superintendent  
20 of schools that was at the helm during the relevant time  
21 period; and I don't know if that person is going to be  
22 available or out.

23 He is working for another Board of Education, and  
24 it's reasonable to believe I may not have contact with him  
25 over the holiday break.

1 I -- if it's not too offensive of a request --  
2 would like to ask -- given the holiday schedule, knowing  
3 that my employees are all going to be out, and I may not  
4 be able to contact them -- for a motion briefing of January  
5 9.

6 THE COURT: Hey, Lynnette, can you go back just a  
7 second? It might have been my phone. You cut out just at  
8 the -- at the end there.

9 You said some folks were going to be out of town  
10 for the holidays, and then I missed -- I missed what you  
11 said after that.

12 MS. DINKLER: Okay. So the holiday break for  
13 Bethel is December 16 to January 3. If it's not pushing the  
14 envelope too much, I would like to ask until January 9 as  
15 the deadline for Defendants to respond to the pending  
16 Preliminary Injunction Hearing?

17 THE COURT: Okay. Before we get to that issue, can  
18 we just focus on -- if you don't mind, both sides don't  
19 mind -- just the Protective Order?

20 So Joey had said -- I think it was Joey -- that the  
21 hope was that we could have it worked out by next week.  
22 Does that seem realistic or not?

23 I'm just trying to do these things in little baby  
24 steps, thinking that I can get on the phone sometime next  
25 week, and the Protective Order will be worked out, but I'm

## 1 CERTIFICATE OF REPORTER

2  
3 I, Julie Hohenstein, Federal Official Realtime  
4 Court Reporter, in and for the United States District Court  
5 for the Southern District of Ohio, do hereby certify that  
6 pursuant to Section 753, Title 28, United States Code that  
7 the foregoing is a true and correct transcript of the  
8 stenographically reported proceedings held in the  
9 above-entitled matter and that the transcript page format is  
10 in conformance with the regulations of the Judicial  
11 Conference of the United States.

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16 s/Julie Hohenstein February 9, 2023  
17 **JULIE HOHENSTEIN, RPR, CRR, RMR**  
18 FEDERAL OFFICIAL REALTIME COURT REPORTER  
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